

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiffs,

v.

ERRICK ROACH,

Defendant.

Case No.: 4:19-cr-00966-SRC-SPM-2

RENEWED MOTION FOR RECONSIDERATION
OF PRE-TRIAL RELEASE

COMES NOW, Defendant, Errick Roach, by and through his counsel, Ryan M. Smith, and hereby moves this Honorable Court to reconsider the pre-trial release of Defendant Roach (hereinafter “Defendant”). As grounds for this motion counsel for defendant states the following.

1. This Honorable Court has ordered that Defendant be detained pending trial pursuant to 18 U.S.C. § 3142(f)(2).
2. Defendant is charged with three offenses under 18 U.S.C. §§ 2119, and three offenses under 18 U.S.C. §§ 924(c) (Counts 1, 2, 3, 4, 7, and 8 of Indictment).
3. This cause is not yet set for trial.
4. Counsel for Defendant has provided alibi defense information to the Government regarding each of the carjackings for which Defendant has been charged.
5. Given the alibi evidence, Defendant believes a bond with house arrest would be the least restrictive detention for Defendant under the circumstances, while recognizing the need to protect the public given the seriousness of the crimes alleged.
6. The Government does not oppose Defendant’s motion for reconsideration of bond.
7. Defendant has been held in custody without bond for over six months.
8. Defendant has no record of prior criminal convictions.

9. Defendant, a full-time college student at Harris Stowe State University, has no financial assets of his own.

10. Defendant has significant ties to the Eastern District of Missouri as all his close and personal family members reside in the St. Louis, Missouri area (including but not limited to: mother, siblings, aunts, uncles, cousins, and grandparents).

11. Defendant has never possessed a U.S. passport, and has never traveled outside of the United States.

12. If released pending trial Defendant would reside with his family who reside within the St. Louis, Missouri Area. Further, Defendant is willing and capable of subjecting to house arrest with permitted travel to/from his residence, HSSU Campus, court, undersigned counsel's office, and medical appointments (as/if necessary).

13. The aforementioned conditions would reasonably assure the safety of the public.

14. This request is made for good cause shown.

WHEREFORE, counsel requests Defendant Errick Roach be granted bond with house arrest, pending trial, and for any such further as this Honorable Court deems just and proper under the circumstances.

Respectfully Submitted,

/s/ Ryan M. Smith
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CERTIFICATE OF SERVICE

The undersigned hereby certifies a copy of the foregoing was electronically filed with the Court for service by means of Notice of Electronic filing on this 8th day of June, 2020, upon:

U.S. Attorney's Office
Eastern District of Missouri
Assistant U.S. Attorney Allison H. Behrens
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/s/ Ryan M. Smith